

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO

MALIBU MEDIA, LLC,	:	
	:	
Plaintiff,	:	Case No. 2:14-cv-805
	:	
vs.	:	Judge Edmund A. Sargus, Jr.
	:	
STEPHEN BECHTEL,	:	Magistrate Judge Mark R. Abel
	:	
Defendant.	:	

STIPULATION OF ADDITIONAL TIME
TO RESPOND TO COMPLAINT

Pursuant to S.D. Ohio Local Civ. R. 6.1(a), Plaintiff Malibu Media, LLC and Defendant Stephen Bechtel stipulate that Defendant shall have an additional twenty-one (21) days, through and including November 25, 2014, to move or plead in response to Plaintiff's Complaint. Defendant has taken no prior stipulated extensions.

In support of this motion, Defendant further states that:

1. The instant action was filed on July 9, 2014.
2. On October 6, 2014, Plaintiff filed an amended complaint naming Stephen Bechtel as the Defendant in this case.
3. On information and belief, Defendant may have been served on or around October 14, 2014.
4. Defendant requests an extension of time of twenty-one (21) days, until November 25, 2014, in which to file a response, in order to attempt to resolve this matter through negotiated settlement.
5. Defendant believes there is a reasonable likelihood the parties will come

to an amicable resolution of this matter, and this Motion is not being made for purposes of delay.

WHEREFORE, Defendant Stephen Bechtel moves this Court to extend his time in which to answer the Complaint for another twenty-one (21) days, up to and including November 25, 2014.

Respectfully submitted,

/s/ Samir Dahman

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Trial Attorney for Defendant Stephen Bechtel

CERTIFICATE OF SERVICE

I certify that on November 3, 2014, I filed the foregoing *Stipulation of Additional Time to Respond to Complaint* with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record.

/s/ Samir B. Dahman
Samir B. Dahman